

Griffin Williams McMahon & Walsh LLP

21 N. 4th St.
Geneva, IL 60134
630-524-2595

Patrick J. Walsh
21 N. Fourth Street
Geneva, IL 60134

Invoice

Invoice Number	9844
Invoice Date	09/30/2021
Payment Due On	10/14/2021
Amount Due	\$29,945.80

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Rule 11 Notice of Intent

Fees

Date	Description	Staff	Rate	Hours	Total
08/05/2020	Legal research and preparation of draft Rule 11 letter and Motion to Dismiss; Review client documents.	PMG	\$400.00	5.00	\$2,000.00
08/10/2020	Complete research and finalize draft Motion for client review.	PMG	\$400.00	3.50	\$1,400.00
08/17/2020	Review of correspondence from Eberhardt; Provide requested exhibits.	PMG	\$400.00	0.40	\$160.00
09/08/2020	Review of file; Correspondence with Eberhardt regarding deadline to dismiss complaint.	PMG	\$400.00	0.50	\$200.00
09/09/2020	Update and edit Motion to Dismiss for filing.	PMG	\$400.00	1.00	\$400.00
09/14/2020	Correspondence with Northern District regarding procedural requirements for noticed motions; Correspondence with Eberhardt regarding same.	PMG	\$400.00	0.60	\$240.00
09/15/2020	Telephone conference with Tom Condon regarding Village's Motion to Dismiss.	PMG	\$400.00	0.50	\$200.00

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09/15/2020	Draft proposed agreed order; Review Minute Order.	PMG	\$400.00	0.40	\$160.00
09/16/2020	Review of Village's Motion to Dismiss; Discussion with client regarding same.	PMG	\$400.00	0.50	\$200.00
10/09/2020	Telephone conference and correspondence with attorney Tom Condon regarding pending Motions and agreed briefing schedule; Correspondence with client regarding same.	PMG	\$400.00	0.60	\$240.00
10/13/2020	Review of Minute Order regarding briefing schedule.	PMG	\$400.00	0.20	\$80.00
10/20/2020	Review of Motion for Leave to Amend; Review proposed amended complaint.	PMG	\$400.00	1.00	\$400.00
10/22/2020	Review of Minute Order regarding Plaintiff's Motion to Amend.	PMG	\$400.00	0.20	\$80.00
10/29/2020	Correspondence with Attorney Covdun regarding Motion to Amend; Correspondence with client regarding same.	PMG	\$400.00	0.50	\$200.00
12/27/2020	Review and edit Response in Opposition to Motion to Dismiss.	PMG	\$400.00	1.00	\$400.00
02/08/2021	Legal services provided - 2/8/2021 - Eberhardt Docket Entry (01.13.21 Briefing Sch Renew Motion Preliminary Injunction Doc. #111 reviewed (0.10 hrs.)	JMR	\$60.00	0.10	\$6.00
02/10/2021	Legal services provided - 2/10/2021 - Eberhardt Motion to Dismiss - PMG Draft Dated 8.5.20 Client review (0.10 hrs) - Eberhardt Response in Opposition to Plaintiff's Motion for Leave to File Corrected Complaint Final 12.28.20 reviewed (0.10 hrs)	PMG	\$400.00	0.30	\$120.00
02/12/2021	Legal services provided - 2/12/2021 - Eberhardt Order 02.10.21 created (0.10 hrs) - 2 emails sent/reviewed regarding Eberhardt Order 02.10.21 (0.30 hrs)	JMR	\$60.00	0.40	\$24.00
02/12/2021	Legal services provided - 2/12/2021 - Eberhardt Order 02.10.21 created (0.10hrs)	JMR	\$60.00	0.10	\$6.00
02/12/2021	Review of Order granting Motion to Dismiss.	PMG	\$400.00	0.70	\$280.00

02/16/2021	Legal services provided - 2/16/2021 - Eberhardt Complaint reviewed (0.10 hrs) - Eberhardt Order (1 20-cv-03269) Order Memo Opinion Order 10.14.20 (1 20-cv-03269) reviewed (0.10 hrs)	JMR	\$60.00	0.20	\$12.00
02/16/2021	Legal services provided - 2/16/2021 - Doc. #79 - Exhibit A to Motion for Leave to File Amended Complaint reviewed (0.10hrs)	JMR	\$60.00	0.10	\$6.00
02/18/2021	Legal services provided 2/18/2021 - Eberhardt Response to Plaintiff's Motion for Leave to File Corrected Complaint w/Exhibits Tinley Park Filed 12.28.20 reviewed (0.10 hrs)	PMG	\$400.00	0.10	\$40.00
02/22/2021	Review of Amended Complaint and various Motions and Orders.	PMG	\$400.00	0.80	\$320.00
02/22/2021	Legal services provided - 2/22/2021 - Eberhardt Order 02.10.21 reviewed (0.10 hrs)	JMR	\$60.00	0.10	\$6.00
02/22/2021	Legal services provided 2/22/2021 - Eberhardt Motion to Dismiss - PMG Draft Dated 8.5.20 Client Review (0.40 hrs) - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 created, then edited (0.30 hrs) - Eberhardt Complaint review (0.10 hrs) - 1 email sent/reviewed regarding Complaint (0.10 hrs)	PMG	\$400.00	0.90	\$360.00
02/23/2021	Legal services provided - 2/23/2021 - 1 email sent/reviewed regarding Rule 11 Notice of Intent (0.10hrs)	PMG	\$400.00	0.10	\$40.00

02/23/2021	Legal services provided - 2/23/2021 - Eberhardt Motion for Preliminary Injunction Eberhardt created (0.10 hrs) - Eberhardt Memorandum of Law In Support of Motion for Preliminary Injunction Eberhardt created (0.10 hrs) - Eberhardt NOM Motion for Preliminary Injunction & Memorandum Eberhardt created (0.10 hrs) - Eberhardt Complaint Amended First Filed 2.22.21 reviewed (0.10 hrs) - Eberhardt Docket Entry 2.22.21 created then reviewed (0.10 hrs) - 2 emails sent/reviewed regarding Eberhardt v. Walsh Case No. 1:20-cv-01171 (0.20hrs)	JMR	\$60.00	0.70	\$42.00
02/23/2021	Legal services provided 2/23/2021 - Eberhardt Motion for Preliminary Injunction 2.23.21 combined created (0.10 hrs) - 1 email sent/reviewed regarding Motion for Preliminary Injunction Combined (0.10 hrs) - Eberhardt DUE Reply ISO Motion for Preliminary Injunction Due Eberhardt attended (1.00 hrs)	PMG	\$400.00	1.10	\$440.00
02/26/2021	Review of emergency motions.	PMG	\$400.00	0.50	\$200.00
02/26/2021	Legal services provided 2/26/2021 - Eberhardt No Appearance Motion for Preliminary Injunction Eberhardt (Judge Norgle Sr.) attended (0.50 hrs)	PMG	\$400.00	0.50	\$200.00
03/02/2021	Review of court order; Correspondence with client regarding same.	PMG	\$400.00	1.00	\$400.00
03/08/2021	Legal services provided 3/08/2021 - Eberhardt Order 03.02.21 TRO created (0.10 hrs)	JMR	\$60.00	0.10	\$6.00
03/09/2021	Legal services provided 3/9/2021 - Eberhardt Rule 11 Notice 3.9.21 created (0.10 hrs) - All notes edited (0.20 hrs) - Eberhardt Complaint Amended First Filed 2.22.21 reviewed (0.50 hrs)	PMG	\$400.00	0.80	\$320.00
03/10/2021	Legal services provided - 3/10/2021 - FILED - 1:20-cv-001171 - PLAINTIFF'S DEADLINE TO FILE AN AMENDED COMPLAINT - Eberhardt v. Village of Tinley Park Et Al attended (0.50hrs)	PMG	\$400.00	0.50	\$200.00

03/10/2021	Legal services provided - 3/10/2021 - FILED - 1:20-cv-001171 - PLAINTIFF'S DEADLINE TO FILE AN AMENDED COMPLAINT - Eberhardt v. Village of Tinley Park Et Al attended (0.50hrs)	JMR	\$60.00	0.50	\$30.00
03/16/2021	Legal services provided - 3/16/2021 - 2 emails sent/reviewed regarding Eberhardt Walsh Deadline dates (0.10 hrs)	JMR	\$60.00	0.10	\$6.00
03/29/2021	Legal services provided 3/29/2021 - Eberhardt NOF Response In Opposition to Plaintiff's Motion for Leave to File Corrected Complaint reviewed (0.40 hrs)	JMR	\$60.00	0.40	\$24.00
03/31/2021	Legal services provided - 3/31/2021 - Eberhardt Rule 11 Notice 3.9.21 reviewed (0.10 hrs) - 3 emails sent/reviewed regarding Eberhardt Rule 11 Notice (0.40 hrs) - 3 emails sent/reviewed regarding Eberhardt v. Waldh Case NO. 1:20-cv- 01171 (0.20 hrs)	JMR	\$60.00	0.70	\$42.00
03/31/2021	Legal services provided 3/31/2021 - Eberhardt Complaint Amended First Filed 2.22.21 reviewed (0.60 hrs) - Eberhardt Rule 11 Notice 3.9.21 edited (0.60 hrs) - Eberhardt Rule 11 Notice of Intent Letter Dated 8.5.20 Client Review (0.20 hrs) - 1 email sent/reviewed regarding Eberhardt Rule 11 Notice (0.10 hrs)	PMG	\$400.00	1.50	\$600.00
04/02/2021	Review of correspondence from Eberhardt; Discuss with client.	PMG	\$400.00	0.50	\$200.00
04/06/2021	Legal Services Provided 4/6/2021 - Eberhardt Complaint Review (0.10 hrs) - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 edited (4.40 hrs) - 1 email sent/reviewed regarding Eberhardt Rule 11 Notice (0.20 hrs)	PMG	\$400.00	4.70	\$1,880.00
04/07/2021	Review of Amended Complaint; Prepare and file Motion to Dismiss.	PMG	\$400.00	4.00	\$1,600.00

04/07/2021	Legal services provided - 4/7/2021 - Eberhardt Rule 11 Notice 03.31.21 reviewed (0.10 hrs) - Eberhardt Rule 11 Notice 3.9.21 reviewed (0.10 hrs) - Eberhardt Rule 11 Notice of Intent Letter Dated 8.5.20 Walsh reviewed (0.20 hrs) - Eberhardt Rule 11 Memo 7.20.20 Walsh reviewed (0.20 hrs) - Eberhardt Tinley Park Purchasing Policy reviewed (0.10 hrs) - Eberhardt Complaint Amended first Filed 2.22.21 reviewed (0.10 hrs) - Eberhardt NOF Response In Opposition to Plaintiff's Motion for Leave to File Corrected Complaint reviewed (0.20 hrs) - Eberhardt Motion to Dismiss w Exhibits 04.07.21 created (0.10 hrs) - 2 emails sent/reviewed regarding Eberhardt v Walsh Case No. 1:20-cv-01171 (0.10 hrs)	JMR	\$60.00	1.20	\$72.00
04/07/2021	Legal services provided 4/7/2021 - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 edited and reviewed (1.10 hrs)	PMG	\$400.00	1.10	\$440.00
04/07/2021	Review of Co-Defendant's Motion to Dismiss.	PMG	\$400.00	0.70	\$280.00
04/09/2021	Review of Order on Motion to Dismiss and Briefing Schedules.	PMG	\$400.00	0.20	\$80.00
04/09/2021	Legal services provided 4/9/2021 - 1 email sent/reviewed regarding Activity in Case 1:20-cv-01171 - Eberhardt v. Village of Tinley Park et al memorandum in opposition to motion (0.10 hrs) - 1 email sent/reviewed regarding Activity in Case 1:20-cv-01171 - Eberhardt v. Tinley Park et al Motion to Dismiss for Failure to State a Claim (0.10 hrs) - 1 email sent/reviewed regarding Activity in Case 1:20-cv-01171 - Eberhardt v. Tinley Park et al terminate hearings (0.10 hrs)	PMG	\$400.00	0.30	\$120.00
04/12/2021	Legal services provided 4/12/2021 - Eberhardt Tinley Park Purchasing Policy reviewed (0.20 hrs)	PMG	\$60.00	0.20	\$12.00

04/12/2021	Legal services provided - 7/12/2021 - Eberhardt Defs' Response to Preliminary Injunction 04.07.21 created (0.10 hrs) - Eberhardt Defs' Motion to Dismiss VOTP et al 04.07.21 created (0.10 hrs) - Eberhardt Docket Entry 04.09.21 created (0.10 hrs)	JMR	\$60.00	0.30	\$18.00
04/19/2021	Legal services provided 4/19/2021 - 1 email sent/reviewed regarding Eberhardt v Walsh Case No. 1:20-cv-01171 (0.10 hrs)	JMR	\$60.00	0.10	\$6.00
04/20/2021	Initial review of Eberhardt's response.	PMG	\$400.00	0.80	\$320.00
04/20/2021	Legal services provided - 4/20/2021 - Eberhardt Plt's Cons Motion t Strike Exhibits & Response to Walsh's Motion to Dismiss Eberhardt Filed 04.20.21 created (0.10 hrs)	JMR	\$60.00	0.10	\$6.00
04/21/2021	Legal services provided - 4/21/2021 1 email sent/reviewed regarding Eberhardt v. Walsh Case No. 1:20-cv-01171 (0.10 hrs)	JMR	\$60.00	0.10	\$6.00
04/22/2021	Legal services provided 4/22/2021 Review response in opposition to Defendant Walsh's Motion to Dismiss	PMG	\$400.00	2.50	\$1,000.00
04/22/2021	Legal services provided 4/22/2021 Review response in opposition to Village of Tinley Park Defendants' Motion to Dismiss	PMG	\$400.00	1.00	\$400.00
04/22/2021	Legal services provided 4/22/2021 - Eberhardt Motion to Dismiss w Exhibits Walsh 04.07.21 reviewed (0.20 hrs) - Eberhardt Reply In Support of Motion to Dismiss created, then edited. (0.30 hrs)	PMG	\$400.00	0.50	\$200.00
04/26/2021	Legal services provided 4/26/2021 - Eberhardt Reply In Support of Motion to Dismiss edited and reviewed. (0.50 hrs)	PMG	\$400.00	0.50	\$200.00
05/04/2021	Legal services provided - 5/4/2021 - Eberhardt NOF Response in Opposition to Plaintiff's Motion for Leave to File Corrected Complaint reviewed (0.10 hrs)	JMR	\$60.00	0.10	\$6.00

05/05/2021	Legal services provided - 5/5/2021 - Doc. #120 - FILED - NOM & COS For Plaintiff's Motion For Preliminary Injunction & Memorandum In Support Of Same - Walsh reviewed (0.10hrs)	JMR	\$60.00	0.10	\$6.00
05/05/2021	Legal services provided on - 5/2021 - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 reviewed (0.10 hrs) - Eberhardt NOF Motion Extend Time Reply ISO Motion to Dismiss 05.05.21 edited and reviewed (0.20 hrs) - Eberhardt Motion to Extend Time Walsh 05.05.21 reviewed (0.10 hrs) - Eberhardt NOF Motion to Extend Time Filed created then reviewed (0.10 hrs) - Eberhardt Walsh NOF Reply ISO Motion to Dismiss First Amended Complaint VOTP, Thirion et al Filed 05.05.21 created (0.10 hrs) - Eberhardt v Walsh Reply ISO Motion to Dismiss First Amended Complaint VOTP Thirion et al Filed 05.05.21 created (0.10 hrs)	JMR	\$60.00	0.80	\$48.00
05/05/2021	Review of Reply Brief of Village, Et Al.	PMG	\$400.00	0.50	\$200.00
05/05/2021	Legal services provided 5/5/2021 - Eberhardt Motion to Extend Time Walsh 05.05.21 edited (0.30 hrs) - 1 email sent/reviewed regarding Eberhardt v. Walsh Motion to Extend Time & NOM (0.10 hrs) - 1 email sent/reviewed regarding Eberhardt v. Walsh - Case No. 1:20-cv-01171 (0.10 hrs)	PMG	\$400.00	0.50	\$200.00
05/05/2021	Prepare and file Motion for Extension of Time to File Reply Brief.	PMG	\$400.00	0.50	\$200.00
05/10/2021	Legal services provided - 5/10/2021 - 2 emails sent/reviewed regarding Eberhardt v Walsh Case No. 1:20-cv-01171 (0.20 hrs)	JMR	\$60.00	0.20	\$12.00

05/10/2021	Legal services provided - 5/10/2021 - Eberhardt Complaint Amended First Filed 2.22.21 reviewed (0.20 hrs) - Eberhardt Motion to Dismiss w Exhibits Walsh 04.07.21 reviewed (0.20 hrs) - Eberhardt Reply in Support of Motion to Dismiss edited (3.10 hrs) - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 reviewed (.030 hrs)	PMG	\$400.00	3.80	\$1,520.00
05/11/2021	Legal services provided - 5/11/2021 - Eberhardt Motion to Dismiss Complaint Amended First Village Filed 04.07.21 reviewed (0.10 hrs) - Eberhardt Complaint Amended First Filed 2.22.21 reviewed (0.10 hrs) - Eberhardt Reply in Support of Motion to Dismiss edited and reviewed (4.70 hrs) - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 reviewed (0.40 hrs)	PMG	\$400.00	5.30	\$2,120.00
05/11/2021	Legal services provided on -5/11/2021 - Eberhardt Walsh Docket Entry 05.11.021 created (0.10 hrs) - Eberhardt Reply in Support of Motion to Dismiss reviewed (0.10 hrs) - Eberhardt Motion to Extend Time Walsh 05.05.21 reviewed (0.10 hrs) - Eberhardt NOF Motion to Extend Tie Reply ISO Motion to Dismiss 05.05.21 reviewed (0.10 hrs)	JMR	\$60.00	0.40	\$24.00
05/12/2021	Legal services provided on 5/12/2021 - Eberhardt Complaint Amended First Exhibits II reviewed (0.20 hrs) - Eberhardt Motion to Dismiss w Exhibits Walsh 04.07.21 reviewed (0.30 hrs) - Eberhardt Reply in Support of Motion to Dismiss edited and reviewed (1.30 hrs) - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 reviewed (0.20 hrs)	PMG	\$400.00	2.00	\$800.00
05/13/2021	Preparation of reply in support of motion to dismiss.	PMG	\$400.00	1.50	\$600.00

05/13/2021	Legal services provided - 5/13/2021 - Eberhardt Reply in Support of Motion to Dismiss reviewed (0.10 hrs) - Eberhardt NOF Reply ISO Motion to Dismiss Walsh 05.13.21 edited and reviewed (0.10 hrs) - 1 email sent/reviewed (0.10 hrs)	JMR	\$60.00	0.30	\$18.00
05/19/2021	Legal services provided - 5/19/2021 - Eberhardt Walsh Docket Entry 05.11.21 reviewed (0.10hrs)	JMR	\$60.00	0.10	\$6.00
07/02/2021	Legal services provided - 7/2/2021 - Eberhardt Consolidated Motion to Strike Exhibits & Response to Walsh's Motion to Dismiss Eberhardt Filed 04.20.21 reviewed (0.10 hrs)	PMG	\$400.00	0.10	\$40.00
08/06/2021	Legal services provided - 8/6/2021 - Eberhardt Consolidated Motion to Strike Exhibits & Response to Walsh's Motion to Dismiss Eberhardt Filed 04.20.21 reviewed (0.10 hrs)	PMG	\$400.00	0.10	\$40.00
09/13/2021	Legal services provided - 9/13/2021 - Eberhardt Reply in Support of Motion to Dismiss reviewed (0.10 hrs) - Eberhardt Motion for Sanctions Rule 11 created, then edited (1.70 hrs)	PMG	\$400.00	1.80	\$720.00
09/14/2021	Legal services provided - 9/14/2021 - Eberhardt Motion for Sanctions Rule 11 edited (0.60 hrs)	PMG	\$400.00	0.60	\$240.00
09/27/2021	Legal services provided - 9/27/2021 - Eberhardt Order 11.9.20 Feinerman reviewed (0.10 hrs) - Eberhardt Motion to Dismiss w Exhibits Walsh 04.07.21 reviewed (0.20 hrs) - Eberhardt Affidavit McMahon created, then edited (1.00 hrs) - Eberhardt Motion to Dismiss Complaint Amended First File 2.22.21 reviewed (0.10 hrs) - Eberhardt Rule 11 Memo 4.16.20 Letterhead reviewed (0.20 hrs) - Eberhardt Motion for Sanctions Rule 11 edited (2.00 hrs)	PMG	\$400.00	3.60	\$1,440.00

09/28/2021	Legal services provided - 9/28/2021 - Eberhardt Plaintiff's Second renewed Motion for Preliminary Injunction w Exhibits Filed Eberhardt reviewed (0.10 hrs) - Eberhardt Motion for Sanctions w Exhibits reviewed (0.10 hrs) - Eberhardt Complaint reviewed (0.10 hrs) - Eberhardt Order 02.10.21 reviewed (0.10 hrs) - Eberhardt Motion for Sanctions Rule 11 edited (3.50 hrs)	PMG	\$400.00	3.90	\$1,560.00
09/28/2021	Legal services provided - 9/28/2021 - Eberhardt NOF Motion for Sanctions (0.20 hrs)	JMR	\$60.00	0.20	\$12.00
09/30/2021	Legal services provided - 9/30/2021 - Eberhardt Affidavit McMahon edited (0.10 hrs) - Eberhardt Affidavit Griffin edited (0.10 hrs) - Eberhardt Memorandum of Law in Support of Motion for Sanctions 11 edited (1.70 hrs)	PMG	\$400.00	1.90	\$760.00
09/30/2021	Legal services provided - 9/29/2021 - Eberhardt Complaint Amended First Filed 2.22.21 reviewed (2.10 hrs) - Eberhardt Motion to Dismiss w Exhibits Walsh 04.07.21 reviewed (0.20 hrs) - Eberhardt Motion to Dimiss - PMG Draft Dated 8.5.20 Walsh reviewed (0.10 hrs) - Eberhardt Motion for Sanctions Rule 11 edited (3.00 hrs) - Eberhardt Affidavit Griffin created, then edited (0.60 hrs)	PMG	\$400.00	6.00	\$2,400.00
09/30/2021	Legal services provided - 9/29/2021 - Eberhardt NOF Motion for Sanctions edited (0.10 hrs) - Eberhardt Ethics Complaint List edited and reviewed (0.20 hrs) - Eberhardt FOIA's 11.01.16 to present reviewed (0.10 hrs)	JMR	\$60.00	0.40	\$24.00
09/30/2021	Legal services provided - 9/30/2021 - Eberhardt FOIA's 11.01.16 to present reviewed (0.10 hrs) - Eberhardt Complaints List edited and reviewed (0.10 hrs)	JMR	\$60.00	0.20	\$12.00
					\$29,938.00

Expenses

Date	Description	Cost	Qty	Total
08/14/2020	Postage - Certified Mail / Return Receipt Requested	\$7.80	1.00	\$7.80
				\$7.80
Subtotal				\$29,945.80
Total				\$29,945.80
Total Balance Due				\$29,945.80

Prior Balances

Date	Invoice Number	Due Date	Amount	Payments	Due
Total			\$0.00	\$0.00	\$0.00

Account Summary

No entries found